

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CHRISTOPHER KOHLS and
MARY FRANSON,

Court File No. 24-cv-03754 (LMP/DLM)

Plaintiffs,

vs.

**DECLARATION OF
PETER J. FARRELL**

KEITH ELLISON, in his official capacity
as Attorney General of Minnesota, and
CHAD LARSON, in his official capacity
as County Attorney of Douglas County.

Defendants.

I, Pete Farrell, declare as follows:

1. I am the Deputy Solicitor General at the Office of the Minnesota Attorney General, and I represent Defendant Keith Ellison, in his official capacity as Minnesota Attorney General, in this case. This declaration is submitted in support of the Attorney General's opposition to Plaintiffs' motion for a preliminary injunction. I make this declaration in good faith based on my personal knowledge of the facts set forth in this declaration and on documents and information that are publicly available, but provided here for the convenience of the Court and the parties.

1. Attached as **Exhibit 1** is a true and correct copy of a post on Facebook by Team Franson on or around July 2, 2024. As of this filing, this post is available at:

<https://www.facebook.com/photo/?fbid=867838408497575&set=a.277034437577978>.

2. Attached as **Exhibit 2** is a true and correct copy of a tweet posted on X by @RepMaryFranson on July 20, 2024. As of this filing, the tweet is available at:

<https://x.com/RepMaryFranson/status/1814692907099582723>.

3. Attached as **Exhibit 3** is a true and correct copy of the video included in the tweet posted on X by @RepMaryFranson on or around July 20, 2024.

4. Attached as **Exhibit 4** is a true and correct copy of a tweet posted on X by @RepMaryFranson on or around July 27, 2024. As of this filing, the tweet is available at:

<https://x.com/RepMaryFranson/status/1817168545186202058>.

5. Attached as **Exhibit 5** is a true and correct copy of a tweet posted on X by @RepMaryFranson on or around August 5, 2024. As of this filing, the tweet is available at: <https://x.com/RepMaryFranson/status/1820491120255877175>.

6. Attached as **Exhibit 6** is a true and correct copy of the video included in the tweet posted on or around X by @RepMaryFranson on August 5, 2024.

7. Attached as **Exhibit 7** is a true and correct copy of a tweet posted on X by @RepMaryFranson on or around August 6, 2024. As of this filing, the tweet is available at: <https://x.com/RepMaryFranson/status/1820623752012382289>.

8. Attached as **Exhibit 8** is a true and correct copy of a tweet posted on X by @RepMaryFranson on or around August 11, 2024. As of this filing, the tweet is available at: <https://x.com/RepMaryFranson/status/1822679555355611337>.

9. Attached as **Exhibit 9** is a true and correct copy of a tweet posted on X by @RepMaryFranson on or around August 27, 2024. As of this filing, the tweet is available at: <https://x.com/RepMaryFranson/status/1828857337966203323>.

10. Attached as **Exhibit 10** is a true and correct copy of a post on Facebook by Team Franson on or around August 28, 2024. As of this filing, the post is available at: <https://www.facebook.com/photo/?fbid=901265311821551&set=a.277034437577978>.

11. Attached as **Exhibit 11** is a true and correct copy of a tweet posted on X by @RepMary Franson on or around August 28, 2024. As of this filing, the post is available at: <https://x.com/RepMaryFranson/status/1828803909059813496>.

12. Attached as **Exhibit 12** is a true and correct copy of a tweet posted on X by @RepMaryFranson on or around September 9, 2024. As of this filing, the tweet is available here: <https://x.com/RepMaryFranson/status/1833213662909370434>.

13. Attached as **Exhibit 13** is a true and correct copy of a tweet posted on by @RepMaryFranson on or around September 16, 2024. As of this filing, the tweet is available here: <https://x.com/RepMaryFranson/status/1835776126259482949>.

14. Attached as **Exhibit 14** is a true and correct copy of a YouTube video entitled “Kamala Harris Ad PARODY,” which was posted on or around July 26, 2024. As of this filing, this video is available on the YouTube channel “Mr. Reagan” at:

<https://www.youtube.com/watch?v=sVspeqNnoWM>

15. Attached as **Exhibit 15** is a true and correct copy of a YouTube video entitled “Barack Obama Endorses Kamala PARODY,” which was posted on or around August 7, 2024. As of this filing, this video is available on the YouTube channel “Mr. Reagan” at: <https://www.youtube.com/watch?v=bMDvXXGdDPo>.

16. Attached as **Exhibit 16** is a true and correct copy of a YouTube video entitled “Kamala Harris Ad PARODY 2,” which was posted on or around July 31, 2024. As of this filing, this video is available on the YouTube channel “Mr. Reagan” at:

<https://www.youtube.com/watch?v=RIjoPqIcyaw>

17. Attached as **Exhibit 17** is a true and correct copy of a YouTube video entitled “Kamala / Tim Walz Phone Call PARODY,” which was posted on or around August 9, 2024. As of this filing, this video is available on the YouTube channel “Mr. Reagan” at:

https://www.youtube.com/watch?v=TEg7yY_Cv60

18. Attached as **Exhibit 18** is a true and correct copy of a YouTube video entitled “Kamala Harris Ad PARODY 3,” which was posted on or around August 14, 2024. As of this filing, this video is available on the YouTube channel “Mr. Reagan” at:

<https://www.youtube.com/watch?v=XMcpVQAA3rc>

19. Attached as **Exhibit 19** is a true and correct copy of a YouTube video entitled “Kamala Harris Ad PARODY 4,” which was posted on or around September 10, 2024. As of this filing, this video is available on the YouTube channel “Mr. Reagan” at:

<https://www.youtube.com/watch?v=Zwj6Gy8ln00>

20. Attached as **Exhibit 20** is a true and correct copy of a YouTube video entitled “Elizabeth Warren Honest DNC Speech PARODY,” which was posted on or around September 13, 2024. As of this filing, this video is available on the YouTube channel “Mr. Reagan” at:

<https://www.youtube.com/watch?v=axuak8SLPeE>

21. Attached as **Exhibit 21** is a true and correct copy of a YouTube video entitled “Gavin Newsom Parody,” which was posted on or around September 23, 2024. As of this filing, this video is available on the YouTube channel “Mr. Reagan” at:

<https://www.youtube.com/watch?v=drWhPBarXQw>

22. Attached as **Exhibit 22** is a true and correct copy of a YouTube video entitled “Kamala Harris Ad PARODY 5,” which was posted on or around September 30, 2024. As of this filing, this video is available on the YouTube channel “Mr. Reagan” at:

https://www.youtube.com/watch?v=eV3SNMD_-Q8.

23. All counsel have agreed to accept service of the conventionally filed exhibits electronically via secure file transfer. Attached as **Exhibit 23** is a true and correct copy of email correspondence confirming same.

24. A recording of the Minnesota House of Representatives’ Elections Finance and Policy Committee Hearing on H.F. 1370 on February 15, 2023, is available here:

<https://www.lrl.mn.gov/media/file?mtgid=1047353>. The discussion of H.F. 1370 starts at approximately 06:51.

25. A recording of the Minnesota House of Representatives’ Judiciary, Finance, and Civil Law Committee Hearing on H.F. 1370 on March 2, 2023, is available here: <https://www.lrl.mn.gov/audio/house/2023/jud030223.mp3>. The discussion of H.F. 1370 starts at approximately 22:26.

26. A recording of the Minnesota House of Representatives’ Public Safety and Finance Policy Committee Hearing on H.F. 1370 on March 9, 2023, is available here:

<https://www.lrl.mn.gov/audio/house/2023/pub030923.mp3>. The discussion of H.F. 1370 starts at approximately 55:31.

27. A recording of the Minnesota House Floor Debate on H.F. 1370 on May 12, 2023, is available here: <https://www.house.mn.gov/hjvid/93/896981> . The discussion of H.F. 1370 starts at approximately 46:00.

28. A recording of the Minnesota Senate's Elections Committee hearing on S.F. 1394 on March 14, 2023, is available here:

<https://www.lrl.mn.gov/media/file?mtgid=1047699>. The discussion of S.F. 1394 starts at approximately 01:20.

29. A recording of the Minnesota Senate's Judiciary and Public Safety Committee hearing on S.F. 1394 on March 24, 2023, is available here:

<https://www.lrl.mn.gov/media/file?mtgid=1047898>. The discussion of S.F. 1394 starts at approximately 4:46:00.

30. A recording of the Senate Floor Debate on S.F. 1394 on May 10, 2023, is available here: <https://www.lrl.mn.gov/media/file?mtgid=1048259>. The discussion of S.F. 1394 begins at approximately 1:23:35.

31. A recording of the Minnesota House of Representatives' Elections Finance and Policy Committee Hearing on H.F. 3625 on February 21, 2024, is available here:

<https://www.lrl.mn.gov/media/file?mtgid=1049300>. The discussion of H.F. 3625 begins at approximately 1:04:54.

32. A recording of the Minnesota House of Representatives' Judiciary, Finance, and Civil Law Committee Hearing on H.F. 3625 on February 29, 2024, is

available here: <https://www.lrl.mn.gov/audio/house/2024/jud022924.mp3>. The discussion of H.F. 3625 begins at approximately 14:57.

33. A recording of the Minnesota Senate's Elections Committee Hearing on S.F. 3550 on February 15, 2024, is available here:

<https://www.lrl.mn.gov/media/file?mtgid=1049230>. The discussion of S.F. 3550 begins at approximately 3:36.

PURSUANT TO 28 U.S.C. § 746, I DECLARE UNDER PENALTY OF PERJURY THAT EVERYTHING I HAVE STATED IN THIS DOCUMENT IS TRUE AND CORRECT.

Dated: November 1, 2024

/s/ **Pete Farrell**
PETER J. FARRELL